

1
2
3
4
5
6
7 **UNITED STATES DISTRICT COURT**
8 **WESTERN DISTRICT OF WASHINGTON**
9 **AT SEATTLE**

10 STATE OF WASHINGTON, et al.,

11 v.
12 Plaintiffs,

13 DONALD J. TRUMP, in his official
14 capacity as President of the United States of
15 America, et al.,

16 Defendants.

17 NO.

18 DECLARATION OF K.G.

19
20
21
22
23
24
25
26
DECLARATION OF K.G.

ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

1 I, K.G., declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make
3 this declaration based on my personal knowledge.

4 2. I live in Redmond, Washington with my partner and our three children. I am
5 employed as an educator in the public school system and my partner is employed by the Federal
6 Government.

7 3. My youngest child is transgender. I have chosen to use initials and refer to my
8 child in this declaration as "Child A" because I am fearful for her and our family's safety and
9 privacy in the current political climate, especially given the President's Executive Order on
10 gender-affirming care for transgender children.

11 4. Child A is currently 12 years old and is in the 6th grade. When she was born, she
12 was designated male on her birth certificate, but her gender identity is female. Child A is the
13 most beautiful, happy, joyous, child. She is brilliant and likes to make people laugh, play board
14 games, read books, and act in drama class. Child A is truly a light in our life.

15 5. When she was younger, Child A suffered from health problems including chronic
16 migraine headaches, sleep disorders, and stomach and bladder issues. She was seen by specialists
17 but there was something else underlying these concerns that we couldn't identify. At age five,
18 Child A began asking to grow her hair out and only wanted to wear gender neutral clothing or
19 items with rainbows. At this point, we thought that sexuality and gender identity were one in the
20 same, so my partner and I tried to encourage Child A to express herself and informed her of
21 options available to her. However, she began to experience suicidal ideations as a result of
22 confusion surrounding her gender identity. Fortunately, we were able to get Child A into an
23 emergency counselor to discuss her feelings.

24 6. One day I was watching a video on transgender identity on Facebook when Child
25 A joined me to watch. We discussed the video and I offered her information about pronouns. A
26 short time later, in January 2022, Child A told us she was either a girl or a girl/boy, but definitely

1 was not a boy. She requested we refer to her by they/them pronouns. I got her a gender identity
 2 workbook that we worked through together. Our family doctor referred Child A to the local
 3 children's hospital to a doctor specializing in gender affirming care, but we were told no medical
 4 intervention was necessary at this age and to just focus on therapy for the time being.

5 7. We were living in a very conservative area of Ohio at the time and Child A's
 6 school was not a supportive environment. Prior to coming out as transgender, Child A was
 7 mocked and harassed at school for wearing her hair long and dressing in androgynous or
 8 feminine clothing. After she came out as transgender and began presenting as traditionally
 9 female, Child A continued to use the boy's bathroom at school because it is where she felt most
 10 comfortable; however, she was bullied by other students who said she was a girl and shouldn't
 11 be in the boy's room. Soon after, Child A requested that we refer to her by a traditionally female
 12 name and she/her pronouns. We discussed Child A's transition with her teachers, counselor,
 13 principal, and superintendent at school and the meeting had seemingly gone well. The school
 14 initially agreed to using Child A's chosen name and offered to give a lesson to her class about
 15 gender identity. It was like watching Child A come back to life as she embraced her funny, joyful
 16 character in her new identity.

17 8. However, the superintendent called shortly after the meeting and informed me
 18 that the school would not be doing anything to support my child's transition and if she used the
 19 girl's bathroom, she would be suspended or expelled. Following this devastating news, I filed a
 20 complaint with the civil rights office in Ohio. I contacted a neighboring school district and
 21 begged the superintendent to allow her to transfer as an emergency exemption; Child A was
 22 accepted to this new school. Our family was going to a gender identity support group and doing
 23 research on the topic, but we were concerned with what would happen to gender affirming care
 24 in Ohio.

25 9. Due to the conservative political climate in Ohio, in July 2022, my partner and I
 26 made the difficult decision to uproot our family and relocate to Washington State, where we

1 hoped our daughter would receive the gender affirming care and support she needed. We left
 2 Ohio at considerable financial expense. In order to have Child A attend a gender-affirming
 3 school, we had to move to a more expensive area.

4 10. Child A's experience at school in Ohio was traumatizing, increasing her anxiety
 5 and general mental health issues that hadn't been seen before. In September 2022, Child A began
 6 fourth grade at her new school in Washington, but chose to be "stealth" regarding her gender
 7 identity because of her previous experiences. At her elementary school, Child A's teacher and a
 8 few members of the school's "Rainbow Club" knew she was transgender, but otherwise we kept
 9 it secret to protect her.

10 11. It has taken Child A several years to recover from her experiences living in Ohio.
 11 She is currently in sixth grade and very few at school know about her transgender identity, as
 12 she is presenting strictly as female. Although Child A made this choice to protect her physical,
 13 emotional, and mental safety, it feels like she is having to hide part of herself from her
 14 classmates.

15 12. In February 2024, Child A was able to see a medical provider that specializes in
 16 gender affirming care and was prescribed a puberty blocker implant. In December 2024, Child
 17 A began using estrogen patches to assist with her transition and is currently receiving ongoing
 18 treatment. Receiving gender-affirming care through puberty blockers and hormones has been
 19 life changing for Child A. It has given her so much hope, she feels affirmed and comfortable in
 20 her own body, and has created such happiness that it can hardly be put into words.

21 13. If Child A were no longer able to access this care from her current providers, it
 22 would cause her immediate harm. Child A has already suffered from suicidal ideations because
 23 of her struggle with gender identity and I am fearful she will revert to thoughts that she is not
 24 worthy of living because of the current political rhetoric from the Trump administration.
 25 Although Child A's puberty blocker will continue to prevent her from going through male
 26 puberty, if she is unable to access estrogen, she will eventually go into a menopausal-like state.

1 Child A deserves to be happy and live a normal life, just like any other child, but if her care is
 2 taken away, she won't be able to live authentically as herself.

3 14. Our family is reliant on my partner's health insurance as a federal employee. As
 4 we understand it, the Executive Order will prevent his insurance from covering Child A's care
 5 starting in 2026. The threats of losing access to healthcare is terrifying. While my spouse and I
 6 try to shelter Child A and our other children from this rhetoric and our stress, they are aware.
 7 While I worry about losing access to our daughter's gender-affirming care in the U.S., our family
 8 will do whatever it takes to continue supporting our child, even if this means uprooting our
 9 family and relocating outside of the country. In the worst-case scenario, our family has discussed
 10 and researched fully uprooting and moving to Canada, New Zealand, or a European country to
 11 continue Child A's life-saving gender-affirming care. Not having this care for Child A is simply
 12 not an option.

13 I declare under penalty of perjury under the laws of the State of Washington and the
 14 United States of America that the foregoing is true and correct.

15 DATED this 3 day of February 2025 at Redmond, Washington.



16
 17 K.G.
 18 Parent of Child A

19
 20
 21
 22
 23
 24
 25
 26